## SWANSON, MARTIN & BELL, LLP

ATTORNEYS AT LAW
ONE IBM PLAZA • SUITE 3300
330 NORTH WABASH, CHICAGO, ILLINOIS 60611
(312) 321-9100 • FAX (312) 321-0990

Writer's Direct Dial Line (312) 923-8260

Writer's E-mail Address eharvey@smbtrials.com

July 10, 2006

## **VIA HAND DELIVERY**

COPY

EPA Region 5 Records Ctr.



Mr. Mazin Enwiya Remedial Project Manager USEPA, Region 5 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Re: Ellsworth Industrial Park Site Downers Grove, Illinois

Dear Mr. Enwiya:

Enclosed, on behalf of Magnetrol International, Inc., are documents responsive to Mr. Krueger's June 12, 2006 letter. I have enclosed the following documents:

- The October 26, 2005, transcript (with exhibits) of the deposition of Loren Data.
- The October 25, 2005, transcript (with exhibits) of the deposition of Joseph Fiedler.
- The November 17, 2005, transcript (with exhibits) of the deposition of Harry Klimek.
- . The October 25, 2005, transcript (with exhibits) of the deposition of James Jani.
- . Magnetrol's responses to Interrogatories in Muniz v. Rexnord Corp., et al.
- The June 14, 2006, expert report of CPI Environmental, Inc., on behalf of Magnetrol, in the *Muniz* matter.

Magnetrol has previously produced, in its 104(e) responses, all available maps, figures, and drawings "depicting the facility and/or depicting the nature or location of any buildings, equipment, utilities, sewer lines, and any other non-natural features at the facility." Additionally, Magnetrol is not producing documents produced to you on June 23, 2006, by Mark Bilut of McDermott, Will & Emery (representing Rexnord Industries, Inc.). Those documents produced by Mr. Bilut include reports and data from investigations of specific properties in the EIP, including Magnetrol's property.

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Please contact me if you have any questions.

Very truly yours,

SWANSON, MARTIN & BELL, LLP

Elizabeth S. Harvey

ESH:jp

**Enclosures** 

cc: Mr. Krueger (without enclosures)